

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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| IN RE AMERICAN INTERNATIONAL |) |
| GROUP, INC. 2007 DERIVATIVE |) Lead Case No. 07-CV-10464 (LAP) |
| LITIGATION |) |
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NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed affidavit of Tamala T. Boyd, sworn to on April 15, 2008, along with the exhibits attached thereto and the accompanying Memorandum of Law, a motion will be made by the Outside Director Defendants before the Honorable Loretta A. Preska, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, on a date to be determined by the Court, for an order, pursuant to Federal Rules of Civil Procedure 12(b)(6), to dismiss the Plaintiffs' Verified Consolidated Shareholder Derivative Complaint, dated February 15, 2008, for failure to state any claim upon which this Court may grant relief.

Dated: New York, New York
April 15, 2008

SIMPSON THACHER & BARTLETT LLP

By /s/ James Gamble

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